

EXHIBIT B-1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FRANKIE WILLIAMS, KIMBERLY ORD
and MATTHEW DEVINE, on their own
behalf and for all others similarly situated,
Plaintiffs,

v.

SECURITAS SECURITY SERVICES USA
INC.,
Defendant.

Civil Action No. 10-cv-07181

Hon. Harvey Bartle, III

DECLARATION OF DAVID J. COHEN, ESQ.

I, David J. Cohen, an attorney in the above-captioned matter, hereby state under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am a partner at the law firm of Kolman Ely, P.C. and a member of the Plaintiffs' Counsel Group in this lawsuit.

2. I submit this declaration to: i) apprise the Court of the total number of attorney hours Kolman Ely, P.C. expended on this litigation; ii) apprise the Court of Kolman Ely, P.C.'s "out-of-pocket" litigation expenses in this matter; iii) provide the Court with justification for calculating my firm's lodestar; and iv) permit the Court to conduct a "lodestar crosscheck" of the attorney's fee sought from the common settlement fund.

3. My professional biography is attached as Exhibit A.

4. According to my contemporaneous time records, I have invested 215.6 hours on this litigation from April 7, 2010 to October 12, 2012. Charged at my current billable rate of \$550.00 per hour, my total lodestar amount in this case is \$118,580, as shown below:

NAME	HOURS WORKED	HOURLY RATE	LODESTAR
David J. Cohen	215.6	\$550.00	\$118,580

My contemporaneous time records supporting this total are available for the Court's inspection upon request.

5. The current hourly rate described above is my usual and customary rate, based on my skill, experience, reputation, and the fees I have recently received in other matters. To my knowledge, this rate is in line with, if not below, the prevailing rate charged by lawyers of comparable skill, experience and reputation in my region who handle similar types of cases.

6. Kolman Ely, P.C.'s business records establish that, from April 7, 2010 to October 12, 2012, the firm's "out-of-pocket" expenses in this litigation are \$790.16. Kolman Ely, P.C. incurred these following expenses, which are typical of the types of expenses a paying client would expect to be charged in litigation of this nature, in the course of my representation:

EXPENSES

<u>DISBURSEMENT</u>	<u>TOTAL</u>
Pro hac admission fees	\$240.00
Filing fees	\$350.00
Service of process	\$85.00
Travel and meal reimbursements	\$115.16
TOTAL	\$790.16

My firm's business records supporting these expenditures are available for the Court's inspection upon request.

I, David J. Cohen, hereby declare, subject to penalty of perjury, that the above facts are true and correct to the best of my knowledge, information, and belief.

Date: October 12, 2012 /s/ David J. Cohen
David J. Cohen, Esq.